Simon v. Adzilla, Inc [New Media] et al

Doc. 127 Att. 16

EXHIBIT Q

Dockets.Justia.com

Scott R. Mosko (State Bar No. 106070)
FINNEGAN, HENDERSON, FARABOW,
GARRETT & DUNNER, L.L.P.
Stanford Research Park
700 Hansen Way
Palo Alto, California 94304
Telephone: (650) 849-6600
Facsimile: (650) 849-6666

Attorneys for Defendants
Connectu LLC, Cameron Winklevoss,
Tyler Winklevoss, Howard Winklevoss,
and Divya Narendra

SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF SANTA CLARA

THE FACEBOOK, INC. Plaintiff, v. CONNECTU LLC, CAMERON WINKLEVOSS, TYLER WINKLEVOSS, HOWARD WINKLEVOSS, DIVYA NARENDRA, AND DOES 1-25, Defendants.	CASE NO. 105 CV 047381 **RESPONSE OF DEFENDANT DIVYA NARENDRA TO FIRST SET OF REQUESTS FOR ADMISSION**

PROPOUNDING PARTY: **Plaintiff THEFACEBOOK, INC.**

RESPONDING PARTY: **Defendant DIVYA NARENDRA**

SET NO.: **ONE (1)**

TO PLAINTIFF AND ITS ATTORNEYS OF RECORD:

The above-named party hereby responds, pursuant to California Code of Civil Procedure Section 2033, to the requests for admission as follows:

RESPONSE TO REQUESTS FOR ADMISSIONS

RESPONSE TO REQUEST NO. 1:

This Request is Denied.

RESPONSE TO REQUEST NO. 2:

Responding party admits visiting FACEBOOK's website but only in his capacity as a member of ConnectU. Regarding the remainder of the Request, see ConnectU's Response to Request No. 2.

RESPONSE TO REQUEST NO. 3:

Responding party admits visiting FACEBOOK's website but only in his capacity as a member of ConnectU. Regarding the remainder of the Request, see ConnectU's Response to Request No. 3.

RESPONSE TO REQUEST NO. 4:

Responding party admits visiting FACEBOOK's website but only in his capacity as a member of ConnectU. Regarding the remainder of the Request, see ConnectU's Response to Request No. 4.

RESPONSE TO REQUEST NO. 5:

Responding party admits visiting FACEBOOK's website but only in his capacity as a member of ConnectU. Regarding the remainder of the Request, see ConnectU's Response to Request No. 5.

RESPONSE TO REQUEST NO. 6:

Responding party admits visiting FACEBOOK's website but only in his capacity as a member of ConnectU. Regarding the remainder of the Request, see ConnectU's Response to Request No. 6.

RESPONSE TO REQUEST NO. 7:

Responding party admits visiting FACEBOOK's website but only in his capacity as a member of ConnectU. Regarding the remainder of the Request, see ConnectU's Response to Request No. 7.

RESPONSE TO REQUEST NO. 8:

Responding party admits visiting FACEBOOK's website but only in his capacity as a member of ConnectU. Regarding the remainder of the Request, see ConnectU's Response to Request No. 8.

RESPONSE TO REQUEST NO. 9:

This Request is Denied.

RESPONSE TO REQUEST NO. 10:

This Request is Denied.

RESPONSE TO REQUEST NO. 11:

This Request is Denied.

RESPONSE TO REQUEST NO. 12:

This Request is Denied.

RESPONSE TO REQUEST NO. 13:

This Request is Denied.

RESPONSE TO REQUEST NO. 14:

This Request is Denied.

RESPONSE TO REQUEST NO. 15:

Responding party admits visiting FACEBOOK's website but only in his capacity as a member of ConnectU. Regarding the remainder of the Request, see ConnectU's Response to Request No. 15.

RESPONSE TO REQUEST NO. 16:

Responding party admits visiting FACEBOOK's website but only in his capacity as a member of ConnectU. Regarding the remainder of the Request, see ConnectU's Response to Request No. 16.

RESPONSE TO REQUEST NO. 17:

Responding party admits visiting FACEBOOK's website but only in his capacity as a member of ConnectU. Regarding the remainder of the Request, see ConnectU's Response to Request No. 17.

RESPONSE TO REQUEST NO. 18:

Responding party admits visiting FACEBOOK's website but only in his capacity as a member of ConnectU. Regarding the remainder of the Request, see ConnectU's Response to Request No. 18.

RESPONSE TO REQUEST NO. 19:

Responding party admits visiting FACEBOOK's website but only in his capacity as a member of ConnectU. Regarding the remainder of the Request, see ConnectU's Response to Request No. 19.

RESPONSE TO REQUEST NO. 20:

Responding party admits visiting FACEBOOK's website but only in his capacity as a member of ConnectU. Regarding the remainder of the Request, see ConnectU's Response to Request No. 20.

RESPONSE TO REQUEST NO. 21:

Responding party admits visiting FACEBOOK's website but only in his capacity as a member of ConnectU. Regarding the remainder of the Request, see ConnectU's Response to Request No. 21.

RESPONSE TO REQUEST NO. 22:

This Request is Denied.

RESPONSE TO REQUEST NO. 23:

This Request is Denied.

RESPONSE TO REQUEST NO. 24:

Responding party admits visiting FACEBOOK's website but only in his capacity as a member of ConnectU. Regarding the remainder of the Request, see ConnectU's Response to Request No. 24.

RESPONSE TO REQUEST NO. 25:

This Request is Denied.

////////////

VERIFICATION

DIVYA NARENDRA, under penalty of perjury under the laws of the State of California, states as follows:

1. That he is one of the Defendants in the above-entitled action;

2. That he has read the foregoing RESPONSE OF DEFENDANT DIVYA NARENDRA TO FIRST SET OF REQUESTS FOR ADMISSIONS and knows the contents thereof, and that the same is true of his own knowledge, save and except as to the matters which are therein stated on his information or belief, and as to those matters, he believes it to be true.

Executed on the __31___ day of October , 2005, at ___NY,NY_______________.

Divya Narendra

Divya Narendra